

Response to IEA Recommendations

Independent Environmental Audit – 2025					
Schedule/ Condition Number	Condition	Recommendation	Compliance Status	Timing	RCM Response
Minister's Conditions of Approval PA 10_0015					
Sch.3-C3	The Proponent shall: (a) implement best practice noise management to minimise the operational, low frequency, and road traffic noise generated by the project; (b) minimise the noise impacts of the project during temperature inversions; and (c) regularly assess the real-time noise monitoring and meteorological forecasting data and relocate, modify, and/or stop operations on site to ensure compliance with the relevant conditions of this approval, to the satisfaction of the Secretary.	ERM recommends Rocglen consult with the DPHI regarding the requirement and their expectations under the current Project Approval and determine what is required to bring it into line with the EPL.	C (Obs)	29 th August 2025	Undertake consultation with the DPHI to confirm noise monitoring requirements as per the current approved Noise Management Plan.
Sch.3-C4	Noise Management Plan The Proponent shall prepare and implement a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by the end of December 2011; (b) describe the noise mitigation measures that would be implemented to ensure compliance with the relevant conditions of this approval; (c) describe the measures that would be implemented to ensure the noise impacts generated by project related traffic on the Kamlaroi Highway overpass are minimised as far as practicable; and (d) include a noise monitoring program that: uses a combination of real-time and supplementary attended monitoring to evaluate the performance of the project; and includes a protocol for determining exceedances of the relevant conditions of this approval.	As per Sch.3-C3	C (Obs) Duplicate with Sch.3- C3	N/A	As per Sch.3-C3

Sch.3-C21	Surface Water Discharges The Proponent shall ensure that all surface water discharges from the site comply with the discharge limits (both volume and quality) set for the project in any EPL.	Historical exceedance with no further action required by the EPA and deemed as no ongoing action required.	NC	N/A	Historical exceedance. No further action required.
Sch.5-C1	Environmental Management Strategy The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval by the end of December 2011; (b) provide the strategic framework for environmental management of the project; (c) identify the statutory approvals that apply to the project; (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; (e) describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the operation and environmental performance of the project; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the course of the project; respond to any non-compliance; respond to emergencies; and (f) include: copies of any strategies, plans and programs approved under the conditions of this approval; and a clear plan depicting all the monitoring required to be carried out under the conditions of this approval.	ERM recommends that WHC review and if required update Figure 2 during the next scheduled EMS review.	C (Obs)	31 st October 2025	During the next scheduled review of the EMS, Figure 2 will be reviewed and if required, updated to align with the Project Approval and Noise Management Plan.
		Environmental Protection Licence 12870			
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	As per Condition L2.4	NC - Duplicate	N/A	Historical exceedance. No further action required.
L2.4	Water and/or Land Concentration Limits POINT 11,12	Historical exceedance with no further action	NC	N/A	Historical exceedance. No

	<table><tr><th>Pollutant</th><th>Unit of measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>Oil and grease</td><td>Milligrams per litre</td><td></td><td></td><td></td><td>10</td></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>6.5 – 8.5</td></tr><tr><td>Total suspended solids</td><td>Milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr></table>	Pollutant	Unit of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and grease	Milligrams per litre				10	pH	pH				6.5 – 8.5	Total suspended solids	Milligrams per litre				50	required by the EPA and deemed as no ongoing action required.			further action required.
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M2.2	Air Monitoring Requirements POINT 4,6 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Particulates – Deposited Matter</td><td>grams per square metre per month</td><td>Continuous</td><td>AM-19</td></tr></table> POINT 10 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>PM10</td><td>micrograms per cubic metre</td><td>Every 6 days</td><td>AM-18</td></tr></table> POINT 17 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>PM10</td><td>micrograms per cubic metre</td><td>Continuous</td><td>AM-22</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Particulates – Deposited Matter	grams per square metre per month	Continuous	AM-19	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Every 6 days	AM-18	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	AM-22	Ensure monitoring downtime due to system or equipment failure is within the required range (10% for continuous emission monitoring methods). Ensure downtime due to equipment failure and/or technical issues is actioned as soon as practicable. All corrective actions taken to address and resolve the issue should be documented comprehensively.	NC	Enacted and Ongoing	Downtime due to equipment failure and/or technical issues will be actioned as soon as practicable. All corrective actions taken to address and resolve the issue will be documented comprehensively.
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Mining Lease ML 1620 - No Non-Compliances noted.
Mining Lease ML 1662 - No Non-Compliances noted.
Consolidated Standard Conditions (ML 1620 & 1662) - No Non-Compliances noted.
Water Access Licences 29461 & 36758 – No Non-Compliances noted.